

# Remedium

**Robert J. Medler**  
**Director**  
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U.S. Environmental Protection Agency  
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Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site  
Monthly Progress Report – April 2009

Dear Bonnie:

This progress report describes work completed during the month of April 2009, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

## MWH

The following is a summary of the actions taken and progress made during the month of April.

### A. ACTIONS TAKEN

- Re-installed ISCO automatic samplers/flow sensors at LRC-06, LRC-02 and CC-02, began flow rate measurements on April 9, 2009.
- Participated in teleconferences on the draft Phase III Sampling and Analysis Plan.

### B. SAMPLING RESULTS

None.

### C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Continue preparation of initial sections (i.e., Introduction, Study Area Investigations, Physical Characteristics of the Study Area and Nature and Extent of Contamination) of the OU3 Remedial Investigation Report.
- Prepare for and perform an evaluation of air-sampling pumps under actual field conditions at OU3. The evaluation will be performed as soon as snow melt and soil drying are sufficient to allow access to forest and logging roads under dusty conditions.

- Perform field reconnaissance to evaluate the feasibility of performing the ABS script at locations proposed by EPA. If conditions at any of the proposed locations will prevent the ABS script from being safely and fully performed, locate suitable nearby alternate locations for EPA consideration.
- Conduct a field tour of the OU3 study area with EPA and its contractors, as discussed during meetings on February 5 at EPA Region 8 headquarters in Denver. The tour will focus on areas outside the mine site, in portions of OU3 proposed for ABS as part of Phase III investigations. The tour will be conducted as soon as snowmelt permits, after field reconnaissance of proposed ABS locations (estimated to be in late May or early June 2009).
- Evaluate (under actual field conditions) air sampling pumps and other equipment required for ABS sampling.
- Begin flow-based sampling of surface water at LRC-06, LRC-02 and CC-02, in accordance with details provided in the Phase III SAP.
- Make preparations for and conduct a field investigation (as soon as snowmelt permits) to characterize the nature of step-like topography on the "over-steepened" slope above and east of the Tailings Dam left abutment.
- Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL  
ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

None.

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The following is a summary of the actions taken and progress made during the month of April.

A. ACTIONS TAKEN

- Participated on a BTAG conference call regarding small mammal histopathology.
- Participated on a BTAG conference call regarding the proposed long-term amphibian toxicity bioassay.
- Reviewed National Toxicology Program studies on asbestos toxicity in small mammals to identify tissues for histopathology examination in small mammal program.
- Provided recommendations to EPA on tissues for small mammal histology.
- Coordinated with mammal histopathologist on questions related to tissue scoring, euthanasia and carcass preservation.

- Reviewed comments received by EPA on OU3 Phase III SAP.

**B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS**

The following tasks are scheduled to be performed over the next two months:

- Receive, review and comment on revised DQOs for amphibians and small mammals reflecting BTAG discussions.
- Receive final Phase III SAP and SOPs.
- Schedule and prepare costs for small mammal reconnaissance trip.
- Conduct reconnaissance of OU3 and reference area small mammal trapping locations at Libby (June 24-25).
- Meet with histopathologist to review necropsy methods and tissue sampling and preservation requirements.
- Schedule and prepare costs for pilot rainbow trout toxicity study.
- Schedule and prepare costs for amphibian toxicity bioassay.

**C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/  
ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED**

- None.

If you have any questions regarding this progress report, please call Bob Marriam at (901) 820-2023.

Sincerely,



Robert J. Medler  
Project Coordinator  
Remedium Group, Inc.

cc: Michael DeDen - MWH  
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John Garr  
Catherine LeCours - Montana DEQ  
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